IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

VS.

LIMESTONE UNIVERSITY F/K/A LIMESTONE COLLEGE, COLLINS MURPHY, MG FREESITES, LTD., D/B/A PORNHUB.COM, and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

CONSENT MOTION IN SUPPORT OF PRO HAC VICE ADMISSION

The undersigned local counsel hereby moves, together with the Application and Affidavit attached as Exhibit A, that Emily Evitt of the law firm Mitchell Silberberg & Knupp LLP be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

- 1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
- 2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
- 3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted pro hac vice; and

4.	Unless excused by the court, I will be present at all pretrial conferences, hearings		
and trials and	d may attend discover	y proc	eedings. I will be prepared to actively participate it
necessary.			
5.	 Certification of Consultation (Local Civil Rule 7.02). ☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐will likely oppose; ☐does not intend to oppose ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s): 		
	No duty of consultation is required because the opposing party is proceeding pro se.		
Respectfully submitted,			
DATED March 1, 2024			TURNER, PADGET, GRAHAM AND LANEY, P.A.
Columbia, S	South Carolina	By:	/s/ Mark B. Goddard Mark B. Goddard Attorney ID: 09194 email mgoddard@turnerpadget.com direct 803-227-4334 J. Kenneth Carter Attorney ID: 05108 email kcarter@turnerpadget.com direct 864-552-4611 Post Office Box 1473 Columbia, South Carolina 29202 facsimile 803-400-1542 Attorneys for Defendant MG Freesites Ltd.